

EXHIBIT D

From: Josh Wackerly <josh@cicalapllc.com>
Sent: Wednesday, January 15, 2025 5:42 PM
To: Harvey, Patrick A.; Scherr, Jason R.; Levy, Lindsey; Compton, Meredith L.
Cc: Joanne Cicala; Johan Conrod; Trey Watkins; Tanya Ellis; Lawrence Deas; William Liston III; Matthew McDonald; Brandon Bogle; Steven Daroci; Tal J Lifshitz; David Buchanan; Benjamin Widlanski; Mark Pifko; Shayna E. Sacks; mdearman@rgrdlaw.com; Pearl Robertson; myeates@ktmc.com; Erich Schork; Jon Neumann; Matthew Gately; Kelly Rinehart; Mike Roberts; Brandon Sadowsky; Robert L. Salim; Karen Sharp Halbert - Roberts Law Firm, P.A. (karenhalbert@robertslawfirm.us); Shelbi Flood; John Alden Meade; Lisa Causey-Streete; Ackerman, Ethan
Subject: Re: Insulin Pricing MDL - Meet and confer on Express Scripts discovery responses
Attachments: ESI Custodians.1.15.docx; Express Scripts Search Terms.2025.1.15.docx

[EXTERNAL EMAIL]

J.R./Pat/Lindsey – we write following up on our December 31 email and responding to your January email.

With respect to custodians, thank you for providing additional information on the 7 “priority custodians” previously offered by ESI. Nevertheless, we understand your position, as set forth in your 12/31 email, that “absent a change to the substantial completion deadline, Express Scripts cannot entertain any expansion of the custodial search Plaintiffs have proposed.” In light of ESI’s position, the parties have necessarily reached an impasse on this matter, as Plaintiffs maintain that ESI’s custodian proposal is deficient. For example, notwithstanding ESI’s refusal to tell us *why* a certain proposed custodian is not relevant, we are providing the attached information to briefly summarize why we have chosen additional custodians including those proposed on 12/31. To reiterate again, the attached custodian list is limited to employees of Express Scripts, Inc., Medco Health Solutions, Inc., or Express Scripts Administrators LLC. Once we receive Express Scripts’ responses and objections to Plaintiffs’ Master Discovery served on the remaining Express Scripts Defendants (ESI Mail Pharmacy Service, Inc.; Express Scripts Pharmacy, Inc., Cigna Group; Evernorth Health, Inc, and Ascent Health Services LLC) we will meet and confer regarding the appropriate custodians for those entities. Furthermore, the attached list does not include ESI pharmacy network-facing or client-facing custodians as the Parties have yet to meet and confer on the scope of ESI’s pharmacy network and client productions.

With respect to search terms, Plaintiffs do not agree with ESI’s position. The search terms that were being negotiated in the Mississippi case are not binding on the parties to this MDL. As you are aware, the parties in Mississippi had not agreed upon a final set of search terms before the MDL formed. Furthermore, there are numerous additional Plaintiffs and counsel in the MDL, as well as different Defendants and causes of action. Nevertheless, while ESI’s responses to our search term validation and TAR questions are also deficient, to advance this process please find attached Plaintiffs’ response to ESI’s Dec 16 proposed search terms. Please also note that we have identified various misspellings of the at-issue drugs, and would like to hear your position on how the parties can best capture such documents in any future protocol.

We look forward to receiving your data field proposal in response to RFP 33 this week.

Please provide times to meet and confer on Tuesday (1/21). We would like to walk through any questions/comments ESI has on our search term so that we can finalize this list expeditiously, in a manner consistent with the guidance we all received from the Court this week. We also seek further explanation as to why - regarding ESI’s anticipated use of TAR - there is any principled reason to delay conferral regarding, for example, richness assessments, recall rates, review cut-offs, and validation. To that end, we would request your e-discovery liaison attend the next conferral to be prepared to discuss these issues. And of course, we urge ESI to reconsider its position on expanding its list of custodians beyond the 7 “priority custodians” that ESI currently stands on. If ESI is willing to expand the custodial list, please be prepared on the next meet and

confer to let us know which additional custodians that ESI will accept and/or to provide reasons for the proposed custodians that ESI rejects.

Regards,

Josh Wackerly



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From: Harvey, Patrick A. <patrick.harvey@morganlewis.com>

Date: Thursday, January 9, 2025 at 1:57 PM

To: Josh Wackerly <josh@cicalapllc.com>, Scherr, Jason R. <jr.scherr@morganlewis.com>, Levy, Lindsey <lindsey.levy@morganlewis.com>, Compton, Meredith L. <meredith.compton@morganlewis.com>

Cc: Joanne Cicala <joanne@cicalapllc.com>, Johan Conrod <johan@cicalapllc.com>, Trey Watkins <Trey.Watkins@formanwatkins.com>, Tanya Ellis <Tanya.Ellis@formanwatkins.com>, Lawrence Deas <Lawrence@listondeas.com>, William Liston III <William@listondeas.com>, Matthew McDonald <MattM@davidnutt.com>, Brandon Bogle <bbogle@levinlaw.com>, Steven Daroci <SDaroci@SeegerWeiss.com>, Tal J Lifshitz <tjl@kttlaw.com>, David Buchanan <DBuchanan@seegerweiss.com>, Benjamin Widlanski <bwidlanski@kttlaw.com>, Mark Pifko <MPifko@baronbudd.com>, Shayna E. Sacks <SSacks@NapoliLaw.com>, mdearman@rgrdlaw.com <mdearman@rgrdlaw.com>, Pearl Robertson <probertson@irpinolaw.com>, myeates@ktmc.com <myeates@ktmc.com>, Erich Schork <erichschork@robertslawfirm.us>, Jon Neumann <jneumann@ktmc.com>, Matthew Gately <MFG@njlawfirm.com>, Kelly Rinehart <kellyrinehart@robertslawfirm.us>, Mike Roberts <mikeroberts@robertslawfirm.us>, Brandon Sadowsky <bsadowsky@kttlaw.com>, Robert L. Salim <skeeter@salim-beasley.com>, Karen Sharp Halbert - Roberts Law Firm, P.A. (karenhalbert@robertslawfirm.us) <karenhalbert@robertslawfirm.us>, Shelbi Flood <shelbi@cicalapllc.com>, John Alden Meade <jam@meadeyoung.com>, Lisa Causey-Streete <lcausey@salim-beasley.com>, Ackerman, Ethan <ethan.ackerman@morganlewis.com>

Subject: RE: Insulin Pricing MDL - Meet and confer on Express Scripts discovery responses

Counsel:

Thank you for your December 31, 2024 email. We appreciate your patience as the snowstorm in the D.C. area delayed our ability to respond to your email sent on New Years' Eve. Some of the questions posed below were addressed by Lindsey Levy's December 23 email sent to you and other Plaintiffs' counsel, so we attach them here for reference. Nevertheless, we respond to your points below.

ESI Custodians

1. Behm, Andrew
 - o Proposed by ESI; agreed by Plaintiffs.
2. Bricker, Amy
 - o Proposed by ESI; agreed by Plaintiffs.
3. Carter, Harold
 - o Proposed by ESI; agreed by Plaintiffs.
4. Kautzner, Adam
 - o Proposed by ESI; agreed by Plaintiffs.
5. Kitson, Julie
 - o Proposed by ESI; agreed by Plaintiffs.
6. Lienemann, Justin
 - o Proposed by ESI; agreed by Plaintiffs.
7. Miller, Steven
 - o Proposed by ESI; agreed by Plaintiffs.
8. Neville, Everett
 - o Head of ESI pharma/manufacturer relations department for most of the relevant time period. Engaged in numerous executive exchange meetings with high level executives from each of the Manufacturer Defendants related to the at-issue drugs.
9. Adamcik, Edward
 - o Ran the Medco and ESI pharma/manufacturer relations department (under E. Neville) during the relevant time period. Engaged in numerous executive exchange meetings with high level executives from each of the Manufacturer Defendants related to the at-issue drugs. Negotiated directly with the Manufacturer Defendants related to Manufacturer Payments and formulary position. Now President of Defendant Ascent Health.
10. Zilocchi, Jason
 - o One of the leads of the Medco and ESI pharma/manufacturer relations department (under E. Adamcik) during the relevant time period. Engaged in numerous meetings with executives from each of the Manufacturer Defendants related to the at-issue drugs. Negotiated directly with the Manufacturer Defendants related to Manufacturer Payments and formulary position.
11. Rhodus, Kelly Tussing

- Key member of ESI pharma/manufacturer relations department. Owned relationships with Novo Nordisk and Sanofi. Engaged in numerous meetings with executives from each of the Manufacturer Defendants related to the at-issue drugs. Negotiated directly with the Manufacturer Defendants related to Manufacturer Payments and formulary position.

12. Jeffrey, Todd

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Sanofi.

13. Nelson, Tracy

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Eli Lilly and Novo Nordisk.

14. Jacobus, Raymond

- Key member of ESI pharma/manufacturer relations department, was part of team working with Lilly, attended VAC meetings.

15. McCarthy, Brian

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Eli Lilly and Novo Nordisk.

16. Bennett, Sharon

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Novo Nordisk.

17. Krikorian, Alex

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Sanofi and Novo Nordisk.

18. Abson, Thomas

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Sanofi.

19. Osbourne, Rob

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Lilly. Now at Ascent Health.

20. Kabir, Arefin

- Key member of ESI pharma/manufacturer relations department. Was part of team negotiating with Novo.

21. Wentworth, Tim

- Engaged directly with the Manufacturers in relevant executive exchange meetings, key ESI public- and government-facing executive, reference throughout MDL complaints.

22. Lang, Susan
 - C-suite level account relationship with Eli Lilly during relevant time period.
23. Morozov, Natasha
 - Financial analyst and formulary consultant. Provided data and analytics support for formulary committees and for Lilly, Novo, and Sanofi Manufacturer negotiation teams.
24. Viets, Leah
 - Financial analyst and formulary consultant. Provided data and analytics support for formulary committees and for Lilly, Novo, and Sanofi Manufacturer negotiation teams. Consultant to VAC.
25. Baig, Tim
 - Head of group that handled pharma rebate invoicing and rebate reports.
26. Wimberly, Gary
 - Chief Information Officer. C-suite level account relationship with Eli Lilly during relevant time period.
27. Drzewucki, Danielle
 - Led analytics team supporting rebate contracting with respect to the at-issue drugs.
28. Debatin, Brian
 - Part of analytics and forecasting team supporting formulary committees and manufacturer negotiation teams with respect to the at-issue drugs.
29. Gass, Dan
 - Part of analytics and forecasting team supporting formulary committees and manufacturer negotiation teams with respect to the at-issue drugs.
30. Muollo, Chris
 - Voting member of the VAC committee, part of VAC decisions on the at-issue drugs.
31. Willmann, Doug
 - Part of analytics and forecasting team supporting formulary committees and manufacturer negotiation teams with respect to the at-issue drugs. Consultant to VAC.
32. Davis, Shawn
 - Chairman and Voting Member of the VAC. Key executive in Lilly account relationship.
33. Lind, Tom
 - Worked in pharma strategies and contracting for the Lilly account team.

34. Eichholz, Jeff

- Chair of VAC during relevant time period, involved in formulary decisions related to the at-issue drugs.

35. Dohm, Jason

- Chair of VAC during relevant time period, involved in formulary decisions related to the at-issue drugs.

36. Paul, Viju

- Managing Director of Business Analytics at ESI and a voting member of the VAC, involved in formulary decisions related to the at-issue drugs.

37. Koch, Rhonda

- Voting member of the VAC, involved in formulary decisions related to the at-issue drugs

38. Gross, Amy

- Key executive on ESI's clinical team and voting member of TAC, involved in clinical assessment of the at-issue drugs with respect to formulary placement.

39. Stettin, Dr. Glen

- Medical director at Medco and ESI, one of the leads of ESI clinical team during relevant time period. C-suite level account relationship with Eli Lilly during relevant time period

40. Pehl, Nancy

- Key executive on ESI's clinical team, attended meetings of the P&T committee, voting member of the TAC, involved in clinical assessment of the at-issue drugs with respect to formulary placement.

41. Seiz, Brian

- Responsible for development and deployment of clinical and UM programs. Key executive in Lilly account relationship.

42. Kuntz, Janelle

- Part of ESI's clinical team, voting member of the TAC, involved in clinical assessment of the at-issue drugs with respect to formulary placement.

43. Henderson, Rochelle

- Head of ESI research team during relevant time period, involved in studies/research related to diabetes.

44. Houts, Jonah

- Handled government and public relations for ESI during the relevant time period.

45. Rosado, Mary

- Handled government and public relations for ESI during the relevant time period, lead the Lilly/ESI Government Affairs team.

46. Le Gette, Lisa

- Was a member of the DoD's Uniform Formulary Benefit Advisory Panel which reviewed the recommendations of the P&T Committee including with respect to the at-issue drugs; ESI was under contract with the DoD at that time.

47. Damato, Kristin Julason

- Handled government and public relations for ESI during the relevant time period, was involved in the ESI response to the Senate Finance Committee re: insulin pricing.

48. Cahill, William

- Identified in ESI's Rule 26 initial disclosures as a person with relevant knowledge.

49. Grillo, Tony

- Consultant to the VAC and involved in formulary decisions related to the at-issue drugs.

50. Novatski, Jeannette

- Voting member of VAC and involved in formulary decisions related to the at-issue drugs

51. Nowak, Lynne

- Director of ESI Therapeutic Resource Center which included outreach to patients, providers, and clients re: insulin/diabetes.

52. Lehmuth, Chris

- Ran data science team that supported formulary committees and manufacturer negotiation teams.

53. Henry, Brian

- Former Vice President, Corporate Communications and involved in marketing decisions for ESI.

54. Pummill, Denise

- Director, Corporate Communications and involved in distribution of client communications.

55. Achter, Leslie

- Former Vice President, Commercial Division Analytic Service. Part of analytics team supporting rebate contracting.

56. Central repositories contributed to by various ESI employees, including:

- The “Marketing” repository; and any repository containing template contracting documents and formulary communications.

57. Libby Newport

- Former Vice President, Strategic Initiatives. Responsible for negotiating with Eli Lilly, Sanofi, and Novo Nordisk regarding rebates, discounts, fees, or other payments for the drugs at issue.

58. Michael Rothrock

- Former Vice President, Pharma Strategy & Contracting. Responsible for negotiating with Eli Lilly, Sanofi, and Novo Nordisk regarding rebates, discounts, fees, or other payments for the drugs at issue.

ESI Search Term Proposal (terms not in ESI proposal in red)**A. Standalone Terms****Diabetes Drugs:**

Apidra* OR Basaglar* OR fiasp* OR Humalog* OR Humulin* OR Lantus* OR Levemir* OR Novolin* OR Novolog* OR Soliqua* OR Toujeo* OR Aspart* OR Rezvoglar* OR Semglee* OR Soliqua* OR Toujeo* OR Degludec* OR Admelog* OR Ozempic* OR Tresiba* OR Trulicity* OR Victoza* OR Glargine* OR Lispro* OR Relion* OR Steglatiro* OR Tanzeum* OR **Mounjaro*** OR **Xultophy*** OR **Rybelsus*** OR **Adlyxyin*** OR **“Insulin Therapy”**

Government Reports:

“Examining the Factors Driving the Rising Cost of a Century Old Drug” OR “Priced Out of a Lifesaving Drug” OR “The Need to Make Insulin Affordable for All Americans” OR “Why is Novo Nordisk Charging Americans with Diabetes and Obesity Outrageously High Prices for Ozempic and Wegovy?” OR “Pharmacy Benefit Managers: The Powerful Middlemen Inflating Drug Costs and Squeezing Main Street Pharmacies” OR “Inaccessible Insulin: The Broken Promise of Eli Lilly’s Authorized Generic”

B. Terms with Connectors**Diabetes Drug Terms:**

antidiabetic* OR **anti-diabetic*** OR Insulin OR Detemir OR GLP* OR Kwikpen OR Lins OR Lispro OR NovoPen OR **Novofine** OR **NovoTwist** OR **PenFill** OR SoloSTAR OR Tanzeum OR Basal OR **Logs** OR Diabet* OR **SGLT2** OR **DPP4** OR **“DPP-4”** OR **“Private Label”** OR **T2D** OR **Flextouch** OR **Flexpen** OR **50/50** OR **70/30** OR **75/25** OR **Liraglutide** OR **Lixisenatide** OR **Semaglutide** OR **Tirzepatide** OR **(authoriz*/3 generic)**

Insulin Manufacturers Terms:

Lilly OR LLY OR **EliLilly** OR Novo* OR **Nordisk** OR **NVN** OR **NVO*** OR NNI OR Sanofi OR **SFI** OR Aventis OR SAV OR **SFI** OR **SNY**

PBM Terms:

Optum* OR **ORx** OR **UHG** OR **Unitedhealth** OR **Catalyst** OR **Catamaran** OR **“Rx Solutions”** OR **“Prescription Solutions”** OR **SXC** OR **Aetna** OR **PacifiCare** OR **CVS** OR **Caremark** OR **CMX**

Rebate Aggregator Terms:

Ascent OR (Zinc **AND (GPO OR “Rebate Aggregator”)**) OR Ibex OR Emisar OR “Coalition for Advance Pharmacy Services” OR CAPS OR (group /3 purchasing) OR (GPO w/15 service*) OR (GPO w/15 fee*) OR “GPO gateway fee*” OR Aggregator OR Incremental OR “Portfolio Rate”

Manufacturer Payment Terms:

AWP OR WAC OR Rebate* OR **REB** OR **Fee*** OR Discount* OR Pric* OR List* OR Cost* OR COG OR **Incentiv*** OR Bid* OR **Proposal*** OR **RFP** OR Audit* OR **Report*** OR **Plan*** OR

Rate* OR **Admin*** OR **AF** OR **MAF** OR **Credit*** OR **Grant*** OR **Concession** OR **Inflat*** OR **“client share”** OR **“value extraction”** OR **“Reconciliation Report”** OR **“Market Share”** **OR “Market Access”** **OR Utiliz*** **OR Payment*** **OR Guarantee*** **OR Protection** OR **PP** OR **PF** OR **RF** OR **EP** OR **Portal** OR **Enterprise** OR **Agreement** OR **Volume** OR **Contract** OR **Grid*** OR **PSG** OR **Disclos*** OR **“Safe Harbor”** OR **Arbitrage** OR **Offer*** OR **“Average Wholesale”** **OR “Wholesale Acquisition”** **OR AMP** OR **Retain*** OR **Profit*** OR **Revenue*** OR **AMP** OR **“1 of”** OR **“Best Price”** OR **“Supply Chain”** **OR Keep** **OR Upside** **OR “Pharmacy Supplemental”** **OR “Indirect Purchase”** **OR “Promotional Allowances”** **OR Margin** **OR “Net Effective”** **OR “Net Net”** **OR “Net-Net”** **OR “Net Retention”** **OR Increment*** **OR “Managed Care”** **OR “Tie”** **OR “Ty*”** **OR “Bundl*”** **OR “Pharma Revenue”** **OR “Retention OR (Data /2 service*)”** **OR Gateway** **OR Predictab*** **OR MSB** **OR “Most Favored Nation”** **OR MFN** **OR chargeback** **OR “Anchor Date”** **OR Base** **OR Lever*** **OR Comparables** **OR “Gross Trend”** **OR ICE** **OR BIM** **OR IHS** **OR “Integrated Health Services”** **OR PRA** **OR “Price Reimbursement Access”** **OR VBC** **OR “Value-Based Decision”** **OR “Generic /5 Specialty”** **OR chargeback** **OR “Price Predictability”** **OR “IP /2 Trend”** **OR “Value Enhancement”** **OR “VE”** **OR “Find It”**

Formulary Terms:

Formular* OR **Develop*** OR **Analy*** OR **“Pharmacy and Therapeutic*”** or **“Pharmacy + Therapeutic*”** OR **“P&T*”** OR **“P & T*”** OR **PDL** OR **Tier** OR **Prefer*** OR **Essen*** OR **Altern*** OR **Exclu*** OR **Disadvantag*** OR **Differential** OR **“National Preferred”** OR **NPF** OR **“High Performance”** OR **HPF** **OR Basic** OR **Flex** OR **“Performance Drug”** OR **“Prescribing Guide”** OR **Committee** OR **“Preferred Products”** OR **Narrow** OR **“Insurance Coverage”** OR **Franchise** OR **“Benefit Design”** OR **(Negotiat* w/50 (UHC OR United* OR Cigna OR Blue Cross* OR BCBS OR Anthem OR Aetna OR Humana OR AvMed))** OR **“Medical Affairs”** **OR OMA** OR **“Drug List”** OR **“Value Assessment”** OR **VAC** OR **“Therapeutic Assessment”** OR **TAC** OR **Pebble** OR **“Prescription Drug Guide”** OR **“Clinical Integrity Council”** OR **CIC** OR **OCEP** OR **“Office of Clinical Evaluation & Policy”** OR **“Drug Evaluation Unit”** **OR DEU** OR **“Firewall /2 Policy”** OR **“Diabetes Care Value”** or **DCV** OR **“Diabetes Therapeutic Resource Center”** OR **TRC** OR **Trend** OR **((Flat OR Fix*) /2 (Dollar OR Rebate OR Percentage))**

Utilization Management Terms:

“Prior Authorization” **OR “Prior Auth”** OR **PA** OR **“Quantity Limit”** OR **QL** OR **QLL** OR **“Step-Therapy”** OR **“Step-Therapies”** OR **“Step Edit”** OR **“Step-Edit”** OR **Step** OR **“Therapeutic Intervention*”** OR **“Therapeutic Substitution”** OR **“Utilization Management”** OR **“Utilization Review”** OR **DUR** OR **UM** OR **UR** OR **“Drug Quantity”** OR **“predictive model”** OR **“member letter”** OR **“education letter”** OR **“polypharmacy outreach”** OR **“polypharmacy letter”** OR **“Adverse Communication”** OR **“NDC Lock”** OR **“counter-detail*”** OR **“counter detail*”** **“counter-promot*”** OR **“counter promot*”** OR **“fail first”**

Pull Through Terms:

“Pull Through” OR **“Pull Thru”** OR **“Pull-Through”** OR **“Pull-Thru”** OR **Liason** OR **“Co-Market*”** OR **“Co Market*”** OR **“High Prescribers”** OR **(Patient /3 Transition)** OR **(Patient /3 Educat*)** OR **(Provider /3 Transition)** OR **(Provider /3 Educat*)** OR **(Prescriber /3**

Transition) OR (Prescriber /3 Educat*) OR (Patient /3 Outreach) OR (Patient /3 Outreach) OR (Provider /3 Outreach) OR (Provider /3 Outreach) OR (Prescriber /3 Outreach) OR (Prescriber /3 Outreach) OR (Member /3 Educat*) OR (Member /3 Transition) OR (Member /3 Outreach) OR (Member /3 Communication) OR (Therapeutic /3 intervention) OR (Patient /3 transition) OR Steer* OR (change /3 notification)

Diabetic Harm Terms:

OOP OR “out of pocket” OR “out-of-pocket” OR “Co Pay” OR “Copay” OR “Co-Pay” OR **Coinsurance** OR **Co-Insurance** OR **Uninsured** OR **Cash** OR **Deductible** OR **HDHP** OR “donut hole” OR “do-nut hole” OR “Coverage Gap” OR **Catastrophic** OR **Unaffordab*** OR (skip* /3 dos*) OR **Ketoacidosis** OR **Suffer*** OR “Bad Press” OR **Ration*** OR **Blind*** OR **Amput*** OR **Death** OR **Die*** OR (Struggl* /20 Afford*) OR (Struggl* /20 Pay*) OR (Unable /20 Afford*) OR (Unable /20 Pay*) OR (Pay /20 “List Price”) OR (Pay /20 WAC) OR (Pay /20 AWP) OR (Patient /20 Adhere*) OR (Diabetic /20 Adhere*) OR “Blink Health” OR “Mark Cuban” OR “Cost Plus” OR **Diabet*** OR (Switch* /3 (medical* OR nonmedical* OR non-medical* OR “non medical*”)) OR **Maximiz*** OR **Accumulat*** OR **Disrupt*** OR “political action committee” OR **PAC**

Client Terms:

Underwrit* OR “Pricing Committee” OR **PC** OR “Provider Relations” OR **Analy*** OR “Clinical Programs” OR “Clinical Project” OR “Clinical Services” OR “Request for Proposal” OR **Proposal** OR **Pass-Through** OR “Pass Through” OR **Pass-Thru** OR “Pass Thru” OR **Spread** OR **Traditional**

Trade Association Terms:

“Pharmaceutical Research and Manufacturers”” OR **PhRMA** OR “Pharmaceutical Care Management Association” OR **PCMA** OR **Pre-Read** OR “Pre read” OR (customer /3 exchange) OR (executive /3 exchange) OR “Annual Meeting” OR “Business Forum” OR (Private /3 meet*) OR “Leadership Summit” OR “Deep Dive” OR “Pharmaceutical Company Partner” OR “J P Morgan Healthcare Conference”

Government/Lobbying Terms:

“Safe Harbor” OR “Safe-Harbor” OR “Bona fide service” OR “Inflation Reduction” OR “Rebate Rule” OR “Transparen*” OR **Investigation** OR **Wyden** OR “Elizabeth Warren” OR “Bernie Sanders” OR **Kickback** OR “Kick Back” OR “Attorney General” OR “Attorneys General” OR “AG” OR **Transpar*** OR “political action committee” OR **PAC** OR **Senat*** OR (House /3 Rep*) OR “Department of Justice” OR **DOJ** OR “Federal Trade Commission” OR **FTC** OR “Health and Human Services” OR **HHS** OR “HELP” OR **Azar** OR “Price Fixing” OR **Collusion** OR **Congress** OR (Reform* w/20 legislat*)

Pharmacy Terms:

Network OR **Clawback** OR **DIR** OR **Pharmacy** OR (CLAW* /3 BACK*) or (dispens* /3 fee)

Committee Terms:

Agenda OR Highlights OR Charter OR Minutes OR “Recommendation Report” OR Model* OR “Exclusion Review” OR Synergy OR Analytic* OR Budget OR Underwrite* OR Financ* OR “Master Deck” OR “Exclusion Deck” OR Rxreport OR “Rx Report”

Consulting Terms:

McKinsey OR “Charles Rivers Associates” OR CRA OR “IMS Consulting Group” OR “IMS Health” OR “ZS Associates” OR “Deloitte Monitor” “Monitor Deloitte” OR Deloitte OR “Advantage Point Solutions” OR “Quarterline” OR “IMS Consulting Group” OR “Putnam Associates” OR KPMG OR “Synopia Rx” OR “Ballina Pharma” OR “Ashfield Healthcare” OR “ZS Associates” OR Milliman OR “Boston Consulting Group” OR BCG OR Redburn OR “Third Party Administrator” OR “Third-Party Administrator” OR TPA OR Premera OR Mercer OR Aon OR Visante

EMAIL/WEB ADDRESSES

lilly.com OR novonordisk.com OR Sanofi.com OR optum.com OR express-scripts.com OR phrma.org OR pcma.org OR cvshealth.com OR catamaranrx.com OR medco.com OR prescriptionsolutions.com OR rxsol.com

C. Search Strings for Terms with Connectors

Standalone Terms

([Insulin Manufacturers Terms] OR [PBM Terms] OR [Rebate Aggregator Terms] OR [Manufacturer Payment Terms] OR [Formulary Terms] OR [Utilization Management Terms] OR [Pull Through Terms] OR [Diabetic Harm Terms] OR [Client Terms] OR [Trade Association Terms] OR [Government/Lobbying Terms] OR [Pharmacy Terms] OR [Committee Terms] OR [Consulting Terms]) w/100 [Diabetes Drug Terms]

[Email/Web Addresses] AND [Diabetes Drug Term]